



# Long-Term Stewardship Inspection Report

## Morco (Coinco Inc)

### EPA ID#: PAD056882822

### Cochranton, PA

#### Introduction

Long-term stewardship (LTS) refers to the activities necessary to ensure that engineering controls (ECs) are maintained and that institutional controls (ICs) continue to be enforced. The purpose of the EPA Region 3 LTS program is to periodically assess the efficacy of the implemented remedies (i.e, ECs and ICs) and to update the community on the status of the RCRA Corrective Action facilities. The assessment is conducted in twofold, which consists of a record review and a field inspection, to ensure that the remedies are implemented and maintained in accordance to the final decision.

#### Site Background

The Morco facility is approximately 10 acres and is located in Cochranton, PA. The Facility manufactures specialty advertising products. The manufacturing process consists of lettering, painting and assembling of component parts. In the production process, some articles require an application of paint. This paint is applied in a spray booth which periodically requires cleaning. The paint sludge removed during cleaning is placed in an Auto-Vac Filter where the liquid and solids are separated. The liquid is poured in the drain which discharges to the lagoon to be recycled back into the painting process. The solids are then transferred into drums and transported to an approved facility as hazardous wastes. The spray booth residuals contain toluene and other organic solvents. Low levels of metals are sometimes detected depending on the pigment use of the batch. All residual sludges are shipped offsite for disposal

In 1986, an investigation was conducted to evaluate soils and groundwater as part of the closure of the former surface impoundment. Contaminated soils from the former impoundment were excavated and shipped offsite for disposal. The Facility installed several groundwater monitoring wells. Elevated volatile organic compounds (VOCs) were detected in groundwater. A groundwater pump and treat system was installed to remediate and control the contamination. After several years of remediation, VOCs levels in groundwater decreased significantly. As a result of the positive progress and in 2008, PADEP modified the original Consent Order and Agreement (CO&A) that allowed Morco to shut down the groundwater remediation system and modify the frequency of groundwater sampling. Presently, Morco monitors two source area wells (MW-5D and 6D) quarterly and five periphery wells annually to assess the conditions of the groundwater plume. After the shutdown of the remediation system the groundwater plume has remained stable and contained within the Facility boundaries. Concentration of VOCs continue to decrease through natural attenuation.

## Current Site Status

Morco continues to monitor the groundwater contamination to confirm that the plume remains stable and confined within the facility boundaries. Morco submits an annual groundwater report to PADEP and EPA that presents and updates the conditions of the plume. A deed restriction is currently placed on the property that prohibits the use of groundwater. In addition, a local ordinance requires that all properties in the town of Cochranton be connected to public water. The plume is located in open space and not beneath any buildings at the Facility. There is no direct exposure to the groundwater contamination and the potential for indoor vapor intrusion is minimal.

## Long-term Stewardship Site Visit

On August 24, 2016, EPA conducted a long-term stewardship site visit with Morco representative, its contractor and PADEP to discuss and assess the status of the implemented remedies at the site.

The attendees were:

Name	Organization	Email Address	Phone No.
Khai M. Dao	USEPA	<a href="mailto:dao.khai@epa.gov">dao.khai@epa.gov</a>	(215) 814-5467
Randy Kresge	PADEP	<a href="mailto:rkresge@pa.gov">rkresge@pa.gov</a>	(814) 332-6846
Neil Bullock	PADEP	<a href="mailto:nbullock@pa.gov">nbullock@pa.gov</a>	(814) 332-6677
David Hart	Morco	<a href="mailto:dhart@morcoline.com">dhart@morcoline.com</a>	(814) 425-7119
Todd Higby	Moody & Assoc.	<a href="mailto:thigby@moody-s.com">thigby@moody-s.com</a>	(814) 724-4970
Stephen M. Roberts	Moody & Assoc.	<a href="mailto:sroberts@moody-s.com">sroberts@moody-s.com</a>	(814) 724-4970

The remedies implemented at the site include engineering and institutional controls. The status and specifics for the respective controls, and a summary of a variety of topics discussed during the meeting and field inspection are presented in the subsequent sections.

## Engineering Controls (ECs)

Engineering controls (ECs) encompass a variety of engineered and constructed physical barriers (e.g., soil cap, subsurface venting systems, fences, groundwater pump and treat) to contain and/or prevent exposure to contamination.

ECs currently implemented at the site consists of groundwater monitoring only. Morco will continue to monitor the groundwater to confirm that the groundwater plume is stable and is contained within the facility property boundaries. Furthermore, Morco will continue to submit an annual groundwater monitoring report to PADEP and EPA to ensure that the groundwater plume onsite does not impact the surrounding community.

## Institutional Controls (ICs)

Institutional controls (ICs) are administrative or legal instruments (e.g., deed restrictions/notices, easements, covenants, zoning) that impose restrictions on the use of contaminated property or resources. ICs are also used to identify the presence of ECs and LTS requirements.

ICs at the facility include land use and groundwater use restrictions. Land use at the site is limited to non-residential use. Any proposed changes in land use beyond the current designated non-residential use will require the approval of PADEP and EPA, and must meet the required cleanup standards for the specific land use. There is no groundwater use at the property. A deed restriction is placed on the property that prohibits the use of groundwater. The property is connected to public water for potable purposes.

**Financial Assurance:**

Given the minimal cost in implementing groundwater monitoring at the Facility, financial assurance is not required.

**Field Inspections:**

EPA, PADEP, Morco and its' contractors conducted a field inspection of the site. The areas of the field inspection included the site of the former surface impoundments and observations of some of the monitoring wells. The Morco representative also provided a brief tour of the manufacturing areas. Given the historic groundwater data at the site and the stabilization of the groundwater plume, the Agencies and Morco discussed the possibility of closing out the site and discontinuing the groundwater monitoring completely. In order to do so a comprehensive study is needed to support the decision that groundwater monitoring is no longer necessary. PADEP will discuss within the Agency to determine if terminating the existing CO&A is a viable option before Morco submits a study to support the discontinuation of the groundwater monitoring and closing out the requirements of corrective action.

**Follow-up Activities:**

PADEP will discuss within the Agency to determine if terminating the existing CO&A is viable option before Morco submits a study to support the discontinuation of the groundwater monitoring and closing out the requirements of corrective action.

**Conclusion:**

EPA concludes that current groundwater monitoring frequency is effective in meeting the objectives of protection of human health and the environment. Despite the shutdown of the remediation system, the groundwater plume has remained stable within the Facility property boundaries. Levels of VOCs in groundwater has steadily decreased through natural attenuation. There are no direct exposures to the groundwater contamination or indirect exposure via indoor vapor intrusion. Morco will continue to conduct the current groundwater monitoring program and may propose a study in the near future to support the termination of the groundwater monitoring program.